May 25,2007

Ms. Marlene H. Doi-tch, Secretary
Federal Cominunications Coinmission
445 12th Street, SW
Washington, DC 20544

Re: Petition for Rulemaking to Change the Distribution Methodology for Shared Local Number Portability and Thousands-Block Number Pooling Costs, RM-11299

Dear Ms. Dortch:

In response to a recent request from the Wireline Competition Bureau, this letter provides information concerning call routing and the Number Portability Administration Center (NPAC) databases. **To** ensure efficient network operation, **all** carriers must maintain correct routing information. The primary differences between incumbent and compctitivc carriers are the tools available to store and update routing information. The current cost allocation method provides the correct incentives to maintain accurate routing informalion, is competitively neutral, and should not be revised.

The routing databases in existence before the implementation of local number portability were designed to **supply** routing information to carriers at the NPA/NXX level because all numbers in a given NPA/NXX **block** were served by a single switch belonging to one carrier. With the advent of number portability and "thousand block pooling", numbers within **an** NPA/NXX block could bc routed differently and **an** additional method of storing routing information below the NPA/NXX block level was required. The NPAC databases are the databases where line-level routing information is stored for ported numbers. The line-level routing informalion contained within the NPAC databases include:

- The Local Routing Number (LRN) that provides originating carriers information necessary to correctly route **a** call to the receiving customer. At the NPA/NXX (10,000 block) level, this routing information is maintained in the Local Exchange Routing Guide (LERG).

- The Line Information Database (LIDB) point **code** that provides the originating routing information needed to query to **the** correct LIDB database where customer information is stored. That information includes whether to block certain calls or allow collect calls. At the NPA/NXX (10,000 block) level, this routing information is provided via the LIDB Access Routing Guide (LARG).

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- The **Calling** Name Database (CNAM) point code provides the completing carrier the necessary routing infomation to direct its query to the correct CNAM database in which the calling party's name is stored. At the NPA/NXX (1 0,000 block) level, this routing information is provided via the Caller Name Routing Guide (CNARG).

Carriers serving customers with ported numbers must keep routing information within the NPAC databases current for the benefit of all customers and carriers. The method by which that routing information is updated is intra-carrier transactions in the NPAC databases described by Verizon, as LNP Type 1 or Download Reason **2** record modifications.[1]

For example, in 2006, TDS Metrocom was required to update CNAM routing information for its customers. This activity was triggered by changes in the CNAM point code made by TDS Metrocom's CNAM provider. In order to ensure accurate routing and continued CNAM functionality, TDS Metrocom was required to update NPAC records to modify the CNAM point code on the NPAC record for cvcry telephone number that had been ported to TDS Metrocom in three states. This change alone generated more that 300,000 intra-carrier NPAC transactions. Under either BellSouth's or Verizon's **proposals,** it appears that TDS Metrocom would be the "cost causa'' for these intra-carrier record updates and therefore charged the NPAC transaction costs for each modified record. TDS Mctrocom merely took the action necessary lo maintain the correct CNAM routing information. The industry and all customers benefit from accurate routing information and, under no reasonable interpretation, did TDS Metrocom "cause" the change in CNAM point code.

The FCC correctly rejected **a** usage-sensitive cost recovery methodology in its Third Report & Order, **as** allocation of costs on a usage-sensitive basis would discourage carriers from performing uploads and downloads to ensure accurate call routing and service functionality. Maintaining the present revenue-based cost recovery mechanism ensures that appropriate incentives are in place for all carriers to maintain accurate databases for the delivery of services to the benefit of all end user customers,

Incumbent LECs still have a significant proportion of telephone numbers assigned in NPA/NXX codes where they serve as the native code-holder **and** as a result are implementing routing changes at the NPA/NXX level via tools like the LERG, CNARG, or LARG. If either BellSouth's or Verizon's proposals to restructure cost allocation were adopted, incumbent carriers that serve **a** majority of their customers without the **need** to utilize the NPAC database to maintain call routing information would be advantaged. Competitive LECs, by the very nature of their customer bases, have **a** higher pcrccntage of their overall numbers that must be maintained via the NPAC databases in order to ensure proper routing. Civcn the **fact** that CLECs have such a large proportion of their numbers that must be served by the NPAC, CLECs have a disproportionate number of

[1] Please scc the January 18,2007 letter from **A.** Berkowitz to M. Dortch in RM-11299

WAC transactions, including intra-carrier transactions. **Adopting** BellSouth's **or** Verizon's proposals would increase CLECs costs to maintain accurate routing information relative lo ILECs for the same function.

Sincerely,

Sara Cole
Manager, Federal Affairs

cc: Albert Lewis
Denna Shetler
Margaret Dailey
Jay Atkinson